

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

In re Golden,

Debtor.

**Chapter 7**

**Case No. 16-40809 (ESS)**

Tashanna B. Golden  
Fka Tashanna B. Pearson,

Plaintiff,

v.

National Collegiate Student Loan Trust 2005-  
3, National Collegiate Student Loan Trust  
2006-4, GS2 2016-A, Pennsylvania Higher  
Education Assistance Agency d/b/a American  
Education Services, Firstmark Services

Defendant.

**Adv. Proc. No. 17-1005 (ESS)**

**DECLARATION OF ADAM R. SHAW IN SUPPORT OF PLAINTIFF'S MOTION  
TO COMPEL DISCOVERY FROM DEFENDANTS NATIONAL COLLEGIATE  
STUDENT LOAN TRUST 2006-4, GS2 2016-A, FIRSTMARK SERVICES, AND  
PENNSYLVANIA HIGHER EDUCATION ASSISTANCE AUTHORITY**

Adam R. Shaw, declares pursuant to 28 U.S.C. § 1746 that:

1. I am a partner in the law firm Boies, Schiller & Flexner, LLP, counsel for the Plaintiff in the above-captioned matter. I submit this Declaration based on my personal knowledge and in support of Plaintiff's Motion to Compel Discovery from Defendants National Collegiate Student Loan Trust 2006-4 "NCT", GS2 2016-A "GS2", Firstmark Services "Firstmark", and Pennsylvania Higher Education Assistance Authority "PHEAA".

2. Attached hereto at Exhibit 1 is a true and correct copy of Plaintiff Tashana B. Golden's Second Request for Production of Documents to Defendant National Collegiate Student Loan Trust 2006-4 (NCT RFP 2) dated November 15, 2018.

3. Attached hereto at Exhibit 2 is a true and correct copy of Plaintiff Tashana B. Golden's Second Request for Production of Documents to Defendant GS2 2016-A (GS2 RFP 2) dated February 23, 2019.

4. Attached hereto at Exhibit 3 is a true and correct copy of Plaintiff Tashana B. Golden's Second Request for Production of Documents to Defendant Firstmark Services (Firstmark RFP 2) dated February 23, 2019.

5. Attached hereto at Exhibit 4 is a true and correct copy of Plaintiff Tashana B. Golden's Second Request for Production of Documents to Defendant Pennsylvania Higher Education Assistance Authority (PHEAA RFP 2) dated November 15, 2018.

6. Attached hereto at Exhibit 5 is a true and correct copy of Response to Plaintiff Tashanna B. Golden's Second Request for Production of Documents to Defendant National Collegiate Student Loan Trust 2006-4 (NCT Response to RFP 2) dated December 17, 2018.

7. Attached hereto at Exhibit 6 is a true and correct copy of Response to Plaintiff Tashanna B. Golden's Second Request for Production of documents to Defendant GOAL

Structured Solutions Trust 2016-A (GS2 Response to RFP 2) dated April 1, 2019.

8. Attached hereto at Exhibit 7 is a true and correct copy of Defendant Nelnet Servicing, LLC's Responses to Plaintiff's Second Request for Production of Documents (Firstmark Response to RFP 2) dated March 27, 2019.

9. Attached hereto at Exhibit 8 is a true and correct copy of Defendant Pennsylvania Higher Education Assistance Agency's Response to Plaintiff's Second Request for the Production of Documents (PHEAA Response to RFP 2) dated May 7, 2019.

10. Attached hereto at Exhibit 9 is a true and correct copy of Plaintiff Tashanna B. Golden's Fourth Request for Production of Documents to Defendant Firstmark Services (Firstmark RFP 4) dated June 28, 2019.

11. Attached hereto at Exhibit 10 is a true and correct copy of Plaintiff Tashanna B. Golden's Fourth Request for Production of Documents to Defendant Pennsylvania Higher Education Assistance Agency d/b/a American Education Services (PHEAA RFP 4) dated July 16, 2019.

12. Attached hereto at Exhibit 11 is a true and correct copy of Defendant Nelnet Servicing, LLC's Responses to Plaintiff's Fourth Request for Production of Documents (Firstmark Response to RFP 4) dated July 29, 2019.

13. Attached hereto at Exhibit 12 is a true and correct copy of Defendant Pennsylvania Higher Education Assistance Agency's Response to Plaintiff Tashanna B. Golden's Fourth Request for Production of Documents (PHEAA Response to RFP 4) dated August 23, 2019.

14. Attached hereto at Exhibit 13 is a true and correct copy of Plaintiff Tashanna B. Golden's Fifth Request for Production of Documents to Defendant Firstmark Services (Firstmark RFP 5) dated July 16, 2019.

15. Attached hereto at Exhibit 14 is a true and correct copy of Plaintiff Tashanna B. Golden's Fifth Request for Production of Documents to Defendant Pennsylvania Higher Education Assistance Agency d/b/a American Education Services (PHEAA RFP 5) dated August 21, 2019.

16. Attached hereto at Exhibit 15 is a true and correct copy of Defendant Nelnet Servicing, LLC's Responses to Plaintiff's Fifth Request for Production of Documents (Firstmark Response to RFP 5) dated August 15, 2019.

17. Attached hereto at Exhibit 16 is a true and correct copy of Plaintiff Tashanna B. Golden's Notice of Deposition of National Collegiate Student Loan Trust 2006-4 and GS2 2016-A Pursuant to Fed. R. Civ. P. (30)(b)(6) and Fed. R. Bankr. P. 7030 dated September 4, 2018.

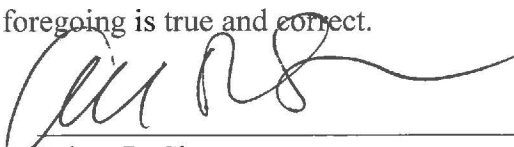
18. Attached hereto at Exhibit 17 is a true and correct copy of Plaintiff Tashanna B. Golden's Notice of Deposition of National Collegiate Student Loan Trust 2006-4 Pursuant to Fed. R. Civ. P. (30)(b)(6) and Fed. R. Bankr. P. 7030 dated August 23, 2019.

19. Attached hereto at Exhibit 18 is a true and correct copy of Plaintiff Tashanna B. Golden's Notice of Deposition of GS2 2016-A Pursuant to Fed. R. Civ. P. (30)(b)(6) and Fed. R. Bankr. P. 7030 dated August 23, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 23, 2019

By:

  
Adam R. Shaw